

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Bell Telephone Company,)	
AT&T Communications of Illinois, Inc.)	
TCG Illinois, TCG Chicago, TCG St. Louis)	
CoreComm Illinois, Inc., WorldCom, Inc.)	
McLeodUSA Telecommunications Services, Inc.)	
XO Illinois, Inc., Northpoint Communications, Inc.)	
Rhythms Netconnection and Rhythms Links, Inc.)	
Sprint Communications L.P., Focal)	Docket No. 01-0120
Communications Corporation of Illinois, and)	
Gabriel Communications of Illinois, Inc.)	
)	
Petition for Resolution of Disputed Issues)	
Pursuant to Condition (30) of the)	
SBC/Ameritech Merger Order)	

**RESPONSE OF AT&T TO OCTOBER 5, 2001 ADMINISTRATIVE LAW
JUDGES' RULING**

AT&T Communications of Illinois, Inc. ("AT&T"), by one of its attorneys, hereby responds to the October 5, 2001 Administrative Law Judges' Ruling. The Administrative Law Judges seek record citations supporting footnotes 21 through 28 and legal citations for the information contained in footnotes 29 and 34 in the Brief of the Illinois Competitive Local Exchange Carriers filed in this proceeding on September 27, 2001. The missing citations will be provided at the end of the footnotes, and will *be italicized and bolded and in brackets*.

I. CITATIONS FOR FOOTNOTES 21-28, 29 AND 34

²¹ Retail performance results for Illinois, as reported by SBC/Ameritech for PM#28 Percent Installations Completed within 5 Business Days – POTS – Residential – Field Work. *[Direct Testimony of Rod Cox, McLeodUSA Exhibit 1.0, p. 10, fn 1.]*

²² *Id.* *[Id. at fn 2]*

²³ Retail performance results for Illinois, as reported by SBC/Ameritech for PM#28 Percent Installations Completed within 5 Business Days – POTS – Business – Field Work. *[Id. at fn 3]*

²⁴ Retail performance results for Illinois, as reported by SBC/Ameritech for PM#56 Percent Installations Completed within 3 Business Days – UNE – 2 Wire Analog (1-10 loops). *[Id. at p. 11, fn 4]*

²⁵ Retail performance results for Illinois, as reported by SBC/Ameritech for PM#55 Average Installation Interval – UNE – 2 Wire Analog (1-10 loops). *[Id. at fn 5]*

²⁶ Retail performance results for Illinois, as reported by SBC/Ameritech for PM#35 Percent Trouble Reports within 30 Days of Install – POTS – Residential – Field Work. *[Id. at fn 6]*

²⁷ Retail performance results for Illinois, as reported by SBC/Ameritech for PM#41 Percent Repeat Reports – POTS – Business. *[Id. at fn 7]*

²⁸ Retail performance results for Illinois, as reported by SBC/Ameritech for PM#39 Receipt to Clear Duration – POTS – Residential – Dispatch – Affecting Service *[Id. at fn 8]*

²⁹ It should be noted that the New York Public Service Commission increased Verizon's total exposure to 44% after finding that Verizon provided the CLECs with substandard service. Moreover, the Georgia Commission set BellSouth's total exposure at 44%. *[Direct Testimony of Dr. Michael Kalb, Joint CLEC Exhibit 1.0, Attachment A, p. 4.]*

³⁴ On September 17, 2001 it was learned that, after weeks of pressure from the Texas PUC, the FCC, and the Department of Justice, SWBT/SBC has withdrawn their request for permission to withhold payments, and has agreed to pay AT&T the remedies it is owed. *[Letter from Cynthia F. Malone, Senior Counsel, Southwestern Bell Telephone Company to Administrative Law Judges Donna Geiger, Nara Srinivasa, and John Mason (September 17, 2001, Public Utility Commission of Texas Docket No. 20400)].*

Respectfully submitted,

AT&T COMMUNICATIONS OF ILLINOIS,
INC.

By: _____
Douglas W. Trabaris
AT&T Law Department
222 West Adams Street
Suite 1500
Chicago, Illinois 60606
(312) 230-2561

Its Attorneys

Dated: October 12, 2001